

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

Michael L. Jones

Plaintiff

v
Raynard Jones and Audrey Evans

defendants

Individually and in their official capacity.

AUG 20 2018

U.S.

DIST.

CIR.

ARE
PDR

Motion for APPOINTMENT

OF COUNSEL

Civil Action No.

07-791-GMS

Jury trial Demanded

Pursuant to 28 U.S.C. § 1915(e)(1) plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel. He has been approved to leave to proceed *in forma pauperis*.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant research and investigation. Plaintiff has no physical access to the Law Library and limited knowledge of the law. Plaintiff's only access to the Law Library is through mail correspondence only which takes weeks and there's only 2 paralegals for 200 inmates so all request are not approved or sometimes they don't even understand what you're looking for so it would be almost impossible for plaintiff to meet the required time limits for filing the proper paper work in this case.
3. A trial in this case will involve conflicting testimony, and counsel would better enable Plaintiff to present evidence and cross-examine witnesses.
4. Plaintiff will have a hard time trying to get the jail/defendants/lawyers to produce certain documents that the plaintiff needs in a timely fashion or at all.

5. Plaintiff has made repeated efforts to obtain a lawyer attached to this motion are some letters I received back from some Lawyers I wrote. But without money they will not represent plaintiff.

WHEREFORE, plaintiff request that the court appoint a member of the Delaware state Bar as counsel in this case.

Respectfully Submitted,

Michael L. Jones 417267

JTVCC

1181 Paddell Road
Smyrna Delaware

19977

Dated: 8-15-08

LAW OFFICES OF
BARROS, McNAMARA, MALKIEWICZ & TAYLOR, P.A.
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Seaford, DE 19973
Telephone: 800-734-LAWS (5297)

Please respond/fax to our Dover office only

August 28, 2007

I/M Michael L. Jones
S.B.I. #417267
Delaware Correctional Center
SHV-Bldg. 17-D-Upper 8
1181 Paddock Road
Smyrna, DE 19947

**LEGAL
CORRESPONDENCE**

Mr. Jones:

My law firm will not represent you in the District Court case that you wrote to us about in a letter dated August 16, 2007. We wish you success in your case.

Sincerely,

BARROS, McNAMARA, MALKIEWICZ
& TAYLOR, P.A.

Michael J. Malkiewicz
MICHAEL J. MALKIEWICZ, ESQUIRE

MJM/sep
P:\SEP\jones.lt.dcc.wpd

David D. Finocchiaro, L.L.C.
Attorneys at Law

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Smyrna, Delaware 19977

Telephone: (302) 653-5091
FAX: (302) 653-5093

August 27, 2007

I/M Michael Jones
SBI # 417267
Delaware Correctional Center
SHU Building 17 D Upper 8
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

Thank you for your letter of August 16, 2007 seeking representation. Unfortunately, I am unable to take this case at this time. I do wish you the best of luck with your case.

Thank you.

Very truly yours,


David D. Finocchiaro

DDF/blb

PENNSYLVANIA INSTITUTIONAL LAW PROJECT

THE CAST IRON BUILDING
718 ARCH STREET, SUITE 304 SOUTH
PHILADELPHIA, PENNSYLVANIA 19106

ANGUS R. LOVE
EXECUTIVE DIRECTOR

PHONE: (215) 925-2966
FAX: (215) 925-5337

July 12, 2007

Michael Jones
417267
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

I am in receipt of your recent letter. I regret to inform you that our Projects funding guidelines prohibit us from handling cases outside the state of Pennsylvania; therefore, we are unable to assist you in this matter. Good luck.

Sincerely,



Katie Henninger
Legal Assistant

CERTIFICATE OF SERVICE

I, Michael J. Jones, hereby certify
that I have served a true and correct copy of the attached motion upon the
following party, on the 16th day of August, 2008.

1. Office of the Clerk
844 N. KING ST Lockbox 18
Wilm Del 19801

2. Attorney General Office
320 N. French st
Wilm Del 19801

3. _____

4. _____

5. _____

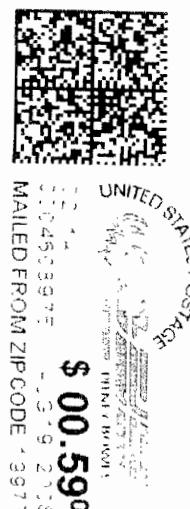
6. _____

Date signed

Signature of Movant
(Notarization not required)

IM Michael Jones
SBI# 417247 UNIT —
JAMES T. VAUGHN CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Office of the Clerk
United States District Court
844 N. King Street, Box 18
Wilmington, Delaware
19801



L - A M C A G E L

